



**SEAN GORTON**

(516) 357-3319

[sean.gorton@rivkin.com](mailto:sean.gorton@rivkin.com)

March 21, 2017

**VIA FEDEX & ELECTRONIC MAIL**

Nicholas Bowers, Esq.  
Gary Tsirelman, P.C.  
129 Livingston Street, Second Floor  
Brooklyn, NY 11201

Re: *Government Employees Insurance Co., et al. v. Phillip, et al.*, Docket No. 1:16-cv-4412(FB)(SMG)  
RR File No.: 005100-02022

Dear Counsel:

As you are aware, we represent Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company, and GEICO Casualty Co. (collectively "Plaintiffs") with regard to the above-referenced matter.

Pursuant to Judge Block's Individual Rules, enclosed please find a Notice of Motion to Stay, Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion to Stay Arbitrations, and the supporting Declaration of Max Gershenoff.

Please contact me at your earliest convenience, so that we can set a briefing schedule. Thank you in advance for your prompt attention to this matter.

Very truly yours,

RIVKIN RADLER LLP

A handwritten signature in black ink, appearing to be "Sean Gorton", written over a horizontal line.

Sean Gorton, Esq.

Encl.